

UNITED STATES DISTRICT COURT

for the

Eastern District of Tennessee

United States of America

v.

Mark O'Neil Robinson

Case No.

3:24-MJ-2150

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 24, 2024 in the county of Knox in the
Eastern District of Tennessee, the defendant(s) violated:

Code Section

21 U.S.C. §§ 841(a)(1), and 841(b)
(1)(A)

Offense Description

Possession with intent to distribute fifty (50) grams or more of
methamphetamine, its salts, isomers, and salts of its isomers and 400 grams
or more of a mixture and substance containing a detectable amount of
fentanyl

This criminal complaint is based on these facts:

See attached affidavit, incorporated herein.

☒ Continued on the attached sheet.



Complainant's signature

Jonathan Wilson, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 6/25/24

City and state: Knoxville, Tennessee



Judge's signature

Jill E. McCook, United States Magistrate Judge

Printed name and title

AFFIDAVIT

3:24-MJ-2150

1. I, Jonathan Wilson, a Special Agent ("SA") with the United States Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations ("HSI"), and being duly sworn, depose and state the following:

2. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), in that I am empowered by law to conduct investigations of, and to make arrest for, offenses enumerated in Title 18, United States Code, Section 2516. I am cross designated and have the authority to conduct Title 21 investigations and enforcement activities. I have been involved with investigations for Title 21 offenses and am familiar with the Interagency Cooperation Agreement between the Drug Enforcement Administration (DEA) and ICE dated June 18, 2009.

3. I have been a Special Agent with HSI since March 2020. In March 2021, I successfully completed both the Criminal Investigator Training Program (CITP) and HSI Special Agent Training (HSISAT) at the Federal Law Enforcement Training Center. From 2017 until 2020, I was employed as a Detective with the Clinton, TN Police Department. From 2011 until 2017, I was employed as a police officer with the Oak Ridge, TN Police Department. During my time in local law enforcement, I was also assigned to the 7th Judicial District Violent Crime and Drug Task Force in Anderson County, TN.

4. I have received extensive training pertaining to narcotic investigations of various crimes that arise from drug trafficking activities. Through my training, conversations with other law enforcement, and my observation experiences in numerous law enforcement investigations, I have become familiar with the methods, operations, and schemes commonly employed by individuals involved in the violation of narcotics statutes. I have investigated multiple cases in the Eastern District of Tennessee and elsewhere involving violations of state and federal narcotics statutes and, as a result, I have been successful in arresting and convicting numerous individuals associated with narcotics distribution. I have been involved in the execution of numerous search warrants dealing with the detection and investigation of federal narcotics violations. I have led federal wiretap investigations and have served as the affiant on Title III wiretaps. As a result of these investigations and prosecutions, I have become aware of various methods and techniques utilized by

individuals within the Eastern District of Tennessee and elsewhere to sell and distribute controlled substances. I am familiar with codes, slang terms, and other terminology used to refer to controlled substances by narcotics traffickers within the Eastern District of Tennessee and elsewhere. I am familiar with the operations of illegal drug trafficking organizations in various parts of the world, including the Eastern District of Tennessee, the Southeastern United States, and Mexico.

I am submitting this affidavit for the limited purpose of establish probable cause for the arrest of Mark ROBINSON ("ROBINSON"), for possession with intent to distribute fifty (50) grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, and 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

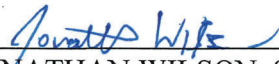
5. The facts in this affidavit are based upon my personal knowledge, as well as knowledge, information, and documentation that I obtained from other law enforcement officers. Since this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include every fact known to me or to other law enforcement officers regarding this matter.

PROBABLE CAUSE

6. On June 20, 2024, United States Magistrate Judge Jill E. McCook issued a federal search warrant in Eastern District of Tennessee authorizing the search of Room #324 of the Siegel Select Knoxville located at 612 Clyde Street NW, Knoxville, TN 37921.

7. On June 24, 2024, law enforcement staged near Siegel Select Knoxville motel, 612 Clyde Street Northwest, Knoxville, TN, in preparation for a search warrant to be executed at Room #324. Throughout the course of this investigation, law enforcement determined Room #324 to be primarily in the control of Mark O'Neil ROBINSON, a known drug trafficker. Prior to the execution of the search warrant, law enforcement observed a white Dodge Durango, bearing Texas registration SYF6824, and operated by ROBINSON, arrive at Siegel Select Knoxville. Law enforcement observed ROBINSON, the sole occupant of the vehicle, park the Dodge Durango in a parking space near a breezeway of Siegel Select Knoxville. Law enforcement entered the parking lot of Siegel Select Knoxville, established contact with ROBINSON, and detained him due to the pending execution of the search warrant for Room #324.

8. Law enforcement informed ROBINSON of the search warrant and noted the odor of marijuana on ROBINSON's person and emanating from the Dodge Durango. A Knox County Sheriff's Office ("KCSO") Patrol Officer then deployed a drug detection K-9 to conduct a free-air sniff of the area around the Dodge Durango. The KCSO K-9 subsequently alerted to the presence of illegal narcotics inside the Dodge Durango. Law enforcement conducted a complete search of the Dodge Durango and located approximately 449 grams of suspected methamphetamine and approximately 446 grams of suspected fentanyl.



JONATHAN WILSON, SA
HSI

Sworn and subscribed before me on
June 25, 2024, in Knoxville, TN.



JILL E. MCCOOK
UNITED STATES MAGISTRATE JUDGE